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January 10, 2014

United States of America, et al. v. American Express Co., et al.  
10-CV-04496-NGG-RER

In re: American Express Anti-Steering Rules Antitrust Litigation (II)  
11-MD-02221-NGG-RER

(This Document Relates to Docket Nos. 08-CV-2315; 08-CV-2316; 08-CV-2317;  
08-CV-2380; 09-CV-2406; 11-CV-0338)

Dear Judge Garaufis:

We represent the American Express Defendants in the above-referenced actions. In accordance with the Court's September 13, 2013, Order, please find enclosed two courtesy copies of the following documents:

- Defendants' Application for Leave to File Documents Under Seal, dated January 9, 2014;
- Reply Memorandum of Law in Further Support of Defendants' Motion To Consolidate for the Purpose of Trial, dated January 9, 2014;
- Declaration of Justine V. Beyda in Further Support of Defendants' Motion To Consolidate for the Purpose of Trial, dated January 9, 2014, with Exhibits 41 to 48.

The aforementioned documents were electronically filed under seal on January 9, 2014. The American Express Defendants filed their opening papers to its Motion To Consolidate on September 26, 2013, and Plaintiffs' opposition papers were filed on November 21, 2013.

Respectfully,



Kevin J. Orsini

Hon. Nicholas G. Garaufis  
United States District Court  
Eastern District of New York  
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Encls.

VIA ECF AND HAND DELIVERY

Copies w/o encls. to:

All Plaintiffs' Counsel (via ECF)